

W H O A !

WILD HORSE ORGANIZED ASSISTANCE
INC.

A Foundation for the Welfare of
Wild Free-Roaming Horses and Burros

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(702)851-4817

April 21, 1985

4/21/85
File Copy
Newspaper art.
P. O. Box 555
Reno, Nevada 89504

Mr. Merrill DeSpain, District Manager
Bureau of Land Management, Ely District
Star Route 5, Box 1
Ely, Nevada 89301

Re: Antelope Range Coordinated Management Plan

Dear Mr. DeSpain:

Thank you very much for the opportunity to review the Draft Antelope Range Coordinated Management Plan (DARCMP). Having had some experience in CRMP, I approached the document with optimism; which quickly soured. The DARCMP easily attains the status of the most difficult document to track to the land use planning process. The CMP encompassed only about one-seventh of the entire Schell Resource Area, so it was necessary to compare the scattered information throughout the CMP to the Proposed Action of the Schell DEIS and Records of Decision. The maps for specific range improvements could not be read and the pages of the CMP were cut off, so references were not readily available.

Hence, my comments hereafter references our serious concern, and utter amazement. It most certainly reflects the impression that BLM has no intention of complying with the land use plans or objectives in the Schell MFP.

NUMBERS OF FORAGING ANIMALS

Proposed Action Schell DEIS, pg. 1-1

- o 1) "grazing by livestock, wildlife, and wild horses continue at existing level.."
- o pg. 1-7) "increases would only be made when monitoring shows additional forage.."
- o 2) "initially leave wild horses at present levels of 5581 AUMs (1982).."
- o 1-1) "initially license livestock use at the past three year (1977-1979) average license use level, or 136,669 AUMs.."



Coordinated Management Plan pg. 21

- o 1) Management Objectives, pg. 21
 - a. present numbers of wildlife
 - b. Interim numbers of livestock
 - c. 1982 levels of wild horses

2) HMAP, pg. GIII-10

"at this time it was decided that wild horses be set at 452.."

COMMENT:

All the above appear to comply with the Schell DEIS, except for the interim levels of livestock, with the Proposed Action and MFP decisions. But, compliance with land use plans stop at this point. What happened to all the work borne out of the Scoping, MFP I, II, the DEIS, and the FEIS? Was the CMP group given the option of eliminating the entire Proposed Action? The CMP does not reflect those decisions and in most cases exceeds the land use plan.

LIVESTOCK

- o Becky Springs Allotment (0101) pg. GIa-3
 - "Warren Robinson is at 40% and increasing herd size.."
- o Sampson Creek Allotment (0105) pg. GIe-3
 - "Warren Robinson is running near 40% of preference and plans to increase this use.."
- o Pg. GIe-9 states: "..if permittee were to activate preference the stocking level would be 2500 sheep.."
- o Pg. GId-9 Chin Creek Allotment states: "..The AUMs needed to meet preference demand will be attainable by using these methods which changes these sites to a seral stage better suited for livestock.."
- o Pg. GId-3 Management Objectives state: "..manage for the most appropriate seral stage to provide quantity, quality variety, and density of forage in order to meet requirements of the key foraging animal. The priority of uses will be established by consensus of livestock permittees, wildlife and wild horse interests and BLM." If the CMP is a product of that type of consensus, then certainly WHOA understands why preference is the key word in this document.
(Page 21, 71, and GId-8)
- o Pg. GIf-7 Table and statements throughout the CMP indicates every bit of seeding will be needed to sustain existing preference. (CMP pg. GId-7, GId-9, GIa-3, GIe-3 GIe-9.)

COMMENT:

Compare statement GId-3 "...manage for the most appropriate seral stage.." to the statement GId-9 "...The AUMs needed to meet preference demand will be attainable by using these methods, which changes these sites to a seral stage better suited for livestock."

The livestock numbers do not look like the BLM took the minimum level, as was done with wild horses, in fact the reader is unable to ascertain what the livestock numbers will be in the CMP, because those will be based on agreements not discussed in the CMP (GIII-11).

I demand to know how you can base livestock adjustments on the next three years worth of monitoring and use past utilization for wild horses! The CMP blatantly states increases in livestock will occur, and we both know the 55% reduction of wild horses will free-up additional AUMs for that increase. What about monitoring? (CMP III A. 1) a.)

The CMP violates the land use planning by reducing wild horses to replace them with livestock. This CMP takes Nevada policy back a step in time where wild horse reductions, massive and costly range improvements, and existing numbers of wildlife will benefit livestock, at the expense of other resource values.

FORAGE AND RANGE IMPROVEMENTS

Schell DEIS pg. 1-7

- o 4) "develop 4000 acres of multiple use seedings and 750 acres of wildlife seedings.." FOR THE ENTIRE SCHELL RESOURCE AREA!

The following compilation of data from the CMP shows how the CMP and BLM has exceeded, by the wildest dreams of the permittee, the land use planning.

- o Becky Springs pg. GIa-7= 2000 acres range conversion
- o Goshute Allotment pg. GId-8= 8000 acres range conversion
- o Sampson Creek Allotment pg. GIe-10= 2600 acres conversion
- o Tippett Allotment pg. GIF-7=18,140 acres range conversion

THE GRAND TOTAL OF RANGE CONVERSION IS 28,000 ACRES.

not 4750 acres as the proposed action!

- o Table GIF-7 indicates every bit of seeding will be needed to sustain existing preference.

RANGELAND DATA

The Schell DEIS states the resource area lacks basic soil mapping, range site delineation, and range condition. It's potential has not been determined. Thus forage production is unknown.

Page four DARCMP

We question how you know how much seeding, etc. will be needed to sustain livestock at the present level or even preference. Has soil mapping, range site delineation, and range condition surveys been done since the MFP decision. If not, what are you doing assuming these many range improvements are necessary before the surveys are done? But WHOA understands why, because if you did not increase the livestock level to preference the range improvements would not be cost-effective! What an absolute disgrace! Where is the BLM's integrity?

The Becky Springs Allotment under category M shows a range type conversion of 1500 acres and seven miles of fenceline! The Deep Creek Allotment under category C shows 10 miles of fenceline!

The CMP on the otherhand indicates a severe deficiency of forage, even though that is not known either. How is that CMP or BLM, for that matter, alter the course from the Proposed Actions and MFP decisions? If you have done the studies, then the CMP proposals are illogical, irresponsible, costly, and counterproductive.

WILDLIFE

According to GII-28 antelope are at or above record numbers, which appears to conflict with NDOW report by Gilbertson. Who is correct?

Several studies, one of which is Hansen-Sheldon, 1982, inferred deer and antelope diets exhibited low overlap with those of wild horses (11 and 10% respectively); a slightly higher overlap exists with cattle (16 and 12% respectively). Of all the possible ungulate pairs, the diets of mule deer and antelope displayed the greatest overlap (76%), both relying heavily on forbs and browse. The highest being Erigeron spp. and Artemisia arbuscula. The only forb measurably consumed by wild horses was Lupinus lepidus. Which I understand is the flower Lupin and is poisonous. Evidently in small doses, the plant is not lethal. The other study inferred a symbiotic relationship between antelope and wild horses, with low dietary overlap, protection from predators, and a fondness for the same open country, but differing diet.

A good example of range improvements to benefit livestock over the needs of wildlife is the letter on page 71, that requests that seedings not be rehabilitated since they were just now becoming more desirable to wildlife as they approach the mid-seral stage. Compare that with the statement on pg. GId-9, wherein the CMP states "the AUMs needed to meet preference demand will be attainable by using these methods which changes the sites to a seral stage better suited for livestock."

Page five DARCOMP

I used to believe that permittees only directed their venom on wild horses and that BLM looked favorably on wildlife over wild horses. I do believe that wild horses are the number one target for the districts and that in the end, if their defenders do not come to their aid, wildlife will be next. While WHOA would defend wildlife, to the extent possible, I remind the BLM by attaching testimony from the Congressional Record H9060, on the purposes behind PL92-195. It states that wild horses should not be singled out for reduction when reductions are required for adverse range conditions. The page is marked and WHOA implores you to read the intent of PL92-195 and understand the consequences. Management of the wild horses would not be difficult if professionals recognized their legitimacy on the public rangelands and managed them in an equitable manner.

For curiosity sake please explain how livestock are competing with antelope habitat when the permit specifically states sheep? (G1e-3) However, sheep show a preference to shrub and forbs (DEIS pg2-6) therefore would impact mule deer.

WILD HORSE

CMP GIII-10 establishes a range of 250-600 wild horses for the appropriate management level (AML). CMP III A.(1)a states "wild horse populations will be adjusted to the lower AML... will benefit livestock and wildlife.." WHOA insists those numbers be the levels established in the Schell DEIS and that those numbers will only be adjusted based on monitoring data; as proposed for livestock. Why the lower number, why weren't they allowed to reach their maximum and then adjust? If indeed there is any basis for setting the minimum and maximum, other than to satisfy permittees.

CMP pg. GIII-11, para 4

Areas of greatest competition have been at valley bottoms..particularly in Spring Valley...heavy utilization of winterfat by wild horses.." There are several research studies which show only minimal use of shrub or forb species by wild horses (Hansen, Sheldon 1982). The CMP states "virtually no sheep utilize this area, does "virtually" mean no sheep or some sheep? The DEIS suggests that sheep have great preference for shrubs. Whatever, it is irresponsible, in light historical use by livestock to attribute destruction of winterfat by wild horses. Since wild horses were at a threatened level in 1971, reduced substantially in 1980, and considering a 5-7% rate of increase, it is impossible for the use to be attributed solely to wild horses. The statement "remnant population of winterfat, which indicates historical overgrazing, not something that occurred in the past few years. And since the CMP G1d-7 states that three seedings are necessary to help reach preference, it also would indicate past and present use by livestock. Appendix G (84 #17) Key Area SCR 3.

Page six DARCOMP

G1e-3 and G1e-4 states winter use of this area is not desirable due to wild horses and snow accumulation; the cattle would create drift problems....., so why is BLM proposing seedings in this area to reach preference?

I remember not too many years ago the Ely District attempted this same situation over the use of winterfat by wild horses, it didn't work then and it is not working now. Since there appears to be no range data to substantiate the need for the reduction, the horses can be adjusted according to monitoring, just like livestock, over the next three years.

ADJUSTMENTS AND MONITORING

The CMP blatantly states throughout the document that wild horses will be reduced, seedings will produce the necessary forage to sustain livestock preference. Therefore adjustments in wild horse numbers at this time is not justified. The Schell DEIS and Proposed Action states the horses will begin at 5581 AUMs and adjustments in numbers will only be made when monitoring shows additional forage. The time frame for monitoring is three years, hence there can be no adjustment in numbers of wild horses until there is sufficient data to substantiate the need. And if and when the horses reach maximum levels, you may take the excess and place them in the herd management areas of White River and Moriah.

If wild horses are reduced below the 452 level then monitoring at the 250 level is illogical. The Schell DEIS Proposed Action states how numbers will be based..on monitoring. What are you people trying to accomplish with CMP, the very things you weren't successful at in Scoping, MFP I, II, DEIS and FEIS?

If the CMP proposal is allowed to occur it will convince the conservation community of what they've long suspected; that BLM will "do nothing and monitor" and is only a temporary ploy to lessen criticism of overgrazing and mismanagement.

COORDINATION OF CMP

Table 1 of the CMP lists 363,523 acres of the Elko District. Supposedly the area is not addressed for management purposes, but the wild horse herd ranges throughout this area. Any management coordination between Ely and Elko has escaped me in the CMP. How can you reconcile the management of these horses, their proposed reduction, knowing full well the proposed fence in the Dolly Varden Flat will separate the herd in two? Suspicion tells me it is all part of the plan to reduce the wild horses on the Ely side even more than the CMP document states.

Page seven DARCOMP

In seven pages I have identified major infractions in the land use plan 1) interim levels of livestock (instead of 136,669) 2) reduction of wild horses without sufficient data 3) range conversions in excess of land use plan 4) range improvements in "M" category 5) range improvements without benefit of soil mapping, range site delineation, and range condition surveys 6) lack of coordination between two districts on the same wild horse herd 7) and massive range improvements whose costs and effectiveness has not been established as necessary.

Now I know I probably missed some of the problems associated with the CMP and the land use decisions; but based on what information was provided by the CMP; WHOA is justified in its' objections to this document. Should BLM ignore the land use decisions and implement this plan WHOA will have no choice but to take legal recourse. BLM will no longer reduce wild horses under the guise of range deterioration, based on assumptions and speculation, and then increase use by livestock.

WHOA WANTS TO KNOW HOW MUCH THIS DOCUMENT COST THE TAXPAYERS?!

The National Mustang Association is to be commended on its' participation in the development of waters for all uses in the Schell Resource Area. The CMP infers the NMA represents wild horse interest groups, this is not the case. They represent their own organization and philosophies.

WHOA cannot and will not accept this document as a representation of the land use decisions. WHOA demands an answer to the questions and inconsistencies with the land use plan.

Most sincerely,

Dawn Y. Lappin (Mrs.)
Director

cc: E.F.Spang
David A. Hornbeck
Sierra Club
Natural Resources Defence Council
International Society for the Protection of Mustangs and
Burros
National Mustang Association

Table 2-11. Summary of occurrence and legal status of protected fish and fishes recommended for protection in or near the Schell Resource Area.

Common name	Scientific name	Classification ^a		Recommended status (Deacon et al. 1979)	Occurrence within Schell Resource Area
		State	Federal		
<u>Trout</u>					
Utah cutthroat	<u>Salmo clarki utah</u>	S		T	Hampton's Creek, Pine (Ridge) Creek
<u>Minnows</u>					
Steptoe dace	<u>Relictus solitarius</u>		T		Shoshone Ponds refugarium, Lookout Spring
<u>Killifishes</u>					
Pahrump killifish	<u>Empetrichthys latos latos</u>	T	E	E	Shoshone Ponds refugarium
White River springfish	<u>Crenichthys baileyi</u>	T		T	Private springs near Sunnyside

Source: USDI, BLM URA-3, Fisheries (1980).

^aT = threatened, E = endangered, S = sensitive.

Table 2-12. Wild Horse Herd Unit characteristics for the Schell Resource Area.

Herd Unit	Size (ac)	Allotments	Herd Size				Conflicts		
			1973	1975	1979	1980	Livestock	Fences	Humans
Antelope	311,869	Becky Springs, Chin Creek, Sampson Creek, Tippett, Tippett Pass, Goshute Mt., Deep Creek		321		252	X	X	
Wilson Creek	691,000	S. Spring Valley, Cottonwood, Hamblin Valley, Geyser, Wilson Creek	151		130		X	X	X
Dry Lake	496,500	Narrows, Geyser, Grassy Mt., Wilson Creek, Fox Mt., Sunnyside	113	13	63		X	X	
Seaman	340,100	Fox Mt., Oreana Springs, Timber Mt., Needles, Seaman Springs, Wilson Creek, Forest Moon, Batterman Wash, Sunnyside, Dry Farm		118	20		X	X	X
Moriah	83,673	Pleasant Valley, Tippett, Mill Spring, Indian George		5	1		X	X	
White River	76,570	Hardy Springs Reserved for Wildlife		27	0			?	

Source: USDI, BLM URA - 3 and 4, Wild Horses (1981).

of wildlife to which I have already alluded.

Mr. GUDE. Let me say to the gentleman that in my action earlier I did not intend to insert a burr under the gentleman's saddle.

Mr. DINGELL. I have the highest regard for the gentleman from Maryland and I wish anything that passed between us earlier would not in any way affect our mutual respect of one another.

Mr. BARING. Mr. Speaker, I yield myself such time as I may consume.

(Mr. BARING asked and was given permission to revise and extend his remarks.)

Mr. BARING. Mr. Speaker, I rise in support of H.R. 9890, a bill to require the protection, management, and control of wild free-roaming horses and burros on the public lands.

Before commenting on the provisions of the bill, I would like to give some brief background information on the present situation of wild horses and burros.

In testimony before the Committee on Interior and Insular Affairs, the Bureau of Land Management and the Forest Service told us there are an estimated 17,000-plus wild horses, mainly in Nevada, Oregon, and Washington. But of this 17,000, it is believed that about 7,500 are either branded or claimed. This leaves an estimated 9,000-10,000 unclaimed free-roaming horses. The estimate for burros was placed at about 10,000, and they are found mainly in Arizona and California.

Thus, it is perfectly clear that the number of these animals have decreased rapidly from the estimated 2 million wild horses that roamed the western ranges in 1900 and that they are, furthermore, decreasing rapidly.

Unless quick action is taken to give these animals greater protection, they will soon be eliminated from the public domain and lost to future generations as a symbol of the west and a part of America's heritage.

For the purposes of this legislation today, I do not think it is necessary to determine the origin of these animals. Some are direct descendants of early Spanish horses, others may be true mustangs and others are undoubtedly the offspring of domestic horses straying from ranches.

However, whatever their origin and whatever their present size and appearance, they are of great emotional interest to a large segment of the American people, especially the young who look upon the wild horse as a symbol of American freedom and liberty. There is also considerable scientific interest in these animals.

At this point, I would like to mention that this is not the first attempt by Congress to give protection to these animals.

In 1959 I authored and had passed Public Law 86-234 this bill, commonly known as the "Wild Horse Annie Act," amended chapter 3 of title 18, United States Code, to prohibit the use of aircraft and motor vehicles to hunt these animals.

Although its objectives were meritorious, in actual practice, for a variety of reasons, this act was largely ineffective and did not provide the protection

needed. While the use of aircraft and motorized equipment probably decreased, these horses and burros were harassed, hunted and killed by other means, and their numbers continued to decrease.

At the present time they have little or no protection. They are not wild game protected by the States. They are not on the endangered species list. They are not claimed by the Federal Government. There are still too many examples of abuse, mistreatment and commercialization of these animals. While one may well argue that it is no worse to process a wild horse or burro than a domesticated one, or even a cow, into dog and cat food, I think it is very clear that the treatment the wild ones receive in the gathering and shipping operations is very frequently much more inhumane and abusive than anything we would condone with domesticated animals.

In my opinion, these animals deserve and must have additional protection, and I feel H.R. 9890 gives that protection.

Briefly, H.R. 9890 authorizes the Secretary of the Interior and the Secretary of Agriculture to assume jurisdiction over, and afford protection to, wild horses and burros on the public lands under their respective administration. It does not require the setting aside of specific or exclusive ranges, but likewise it does not prohibit ranges if they are practical and necessary, and it certainly would not require the elimination of the present Pryor Mountain Range in Montana and Wyoming, nor would it in any way detract from the range has been established in southern Nevada by the Interior Department in cooperation with the U.S. Air Force and the Nevada Fish and Game Commission.

The thought behind the entire proposal is to give maximum protection with minimum interference or management by the Federal agencies. I think it was the feeling of the committee members that they did not want elaborate management schemes, with visitor centers, roads and overlooks. The idea is not to create a zoo atmosphere, but to protect these animals from harm and then to leave them alone.

However, and this is very important, the bill recognizes that there must be some authority by which the Secretary can eliminate old, sick, or weak animals. That he must also have authority to prevent overpopulation and destruction of the habitat. This control is authorized, but it must be carried out in a humane manner.

I want to state most emphatically that it is not the purpose of this legislation to exempt wild horses and burros from all population control on the public lands.

We recognize that these animals may, at some time in the future, overpopulate their ranges. This situation is no different from that presented by any wild game herd or, for that matter, by domestic livestock. There must always be a proper balance between animals using the range and the available forage. Otherwise the habitat suffers and eventually the range will be destroyed.

What this legislation does do is to prevent the wholesale slaughter of wild horses and burros for the benefit of all other animals using the range.

Wild horses and burros, in my opinion, should receive the same consideration as those animals more commonly considered wildlife, such as deer, elk, desert sheep and as domestic livestock now using the public lands. Wild horses and burros alone should not be singled out for slaughter or reduction if and when reduction is required by adverse range conditions. All too often this has been the practice in the past and this is what we want to avoid by this legislation.

While we recognize that there may be, in a very few isolated areas, some competition for forage between, for example, bighorn sheep and wild burros, such competition is unusual. And where such competition does occur, it is much less direct than that between bighorn sheep and domestic sheep or with the introduced exotics such as the barbary sheep in New Mexico.

From the information I have, there is little, if any, competition between wild horses and other game species such as deer or elk. In the unlikely event there is competition, the bill clearly provides authority for appropriate management practices, including herd reductions.

A nine-member joint advisory board has been authorized to assist and consult with the two Secretaries regarding the protection and management of wild horses and burros. It is our intention and hope that this board will play an active and prominent role.

The committee recognized that one of the most difficult problems is the identification of a wild horse or burro from one that has strayed. All privately owned animals are not branded so the lack of a brand was not a complete answer. Recognizing the complexity of this problem, the bill provides that any recovery of a horse or burro, claimed by an individual, must be made under the branding and estray laws of the particular State. While this may not provide a perfect solution, it appears to be a practical approach and permits full play of State law.

In order to prevent over-management, the bill also provides that nothing in it would authorize the Secretary to relocate wild horses or burros to lands where they do not presently exist.

The heart of the bill is in section 8 which sets out the restrictions and protective measures afforded as well as the penalty for violations.

It provides that wild horses and burros may not be removed from public lands or put to private use without authorization from the Secretary. It also prohibits the killing, harming, processing into commercial products of any wild horse or burro as well as the sale of wild horses or burros maintained on private lands. The maximum penalty is a fine of \$2,000 or 1 year imprisonment or both.

Mr. Speaker, I think we have a bill here that will give the necessary protection for wild horses and burros to hold their own. The bill has wide popular support and has been sponsored by 115 of my colleagues in the House.

I strongly recommend enactment of this bill, House Resolution 9890, by this body.

Mr. JOHNSON of California. Mr. Speaker, the legislation I appear today to support concerns the preservation of

3/28/85



STATE OF NEVADA
DEPARTMENT OF WILDLIFE

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RICHARD H. BRYAN
Governor

WILLIAM A. MOLINI
Director

March 28, 1985

Ms. Linda A. Ryan, Director
Office of Community Services
State Clearinghouse
1100 East William, Suite 109
Carson City, NV 89710

Dear Linda:

We appreciate the opportunity to review and provide comment on the Draft Antelope Range Coordination Management Plan (SAI NV #85300055) which was prepared by the Ely District of the Bureau of Land Management. Representatives of our agency have been involved in the development of the plan from a wildlife input perspective during the past year. We support the coordinated management planning process and commend the Ely District for attempting to integrate various land uses such as livestock, wild horses, and wildlife into a single plan. Based on past problems associated with wildlife habitat management plans which were not coordinated with other land uses activities, we would encourage the BLM to continue with this coordinated type of approach.

We believe the plan's General Management Objectives do give reasonable and equitable objectives for wildlife. We would suggest, however, that in addition to providing habitat for major species such as mule deer, antelope, and small game, that all existing habitat be maintained or improved to provide those stated objectives for all species. We fully support the objective which states; "Where a foraging animal can be identified as the primary agent causing forage resource damage in a specific area, reductions will be made from the numbers of this particular foraging animal."

Within the Specific Management Objectives, we are unclear as to the relationship of density (plants/acre) with respect to percent canopy cover. Since many wildlife needs are based on a percent canopy requirement, we believe that the plant/acre figures become increasingly important. We are also curious about the wide range in density potential for crested wheat. For example, the listed potential ranges from 18,000 to 32,000 on one site to 17,000 to 637,000 on another seeding.

Ms. Linda A. Ryan
March 28, 1985
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Within the Management Action section, we would suggest that the guidelines established for sage grouse protection in proposed seeding projects be made a part of the management plan. This concept is particularly important for projects 18 and 19, Lookout Springs and Old Highway Bench. Wing data from eastern Nevada suggest that disturbance of strutting and nesting grounds should be avoided from March 15 through July 10, if possible. If adjustments are deemed necessary, they should be aligned toward the end of the spectrum.

For the Antelope Valley treatment area as presented on GId-14, it is indicated that the only rest during the actual growing season (March through June) will be during March of some years. We would suggest the consideration of providing rest at least during April and May on alternate years as a minimum attempt to provide rest during the actual growing season. Under the proposed treatment, we have a concern that Antelope Valley would be grazed annually during April, May, and June without adequate rest.

With respect to domestic sheep use in the Antelope Mountain treatment area, May 15 may be too early, especially in the high country where plant phenology is delayed, to provide proper rest during the growing season. Perhaps a system could be considered which would provide some rest on alternate years by working the sheep from north to south the first year and then reversing the pattern the following year.

For the Black Hills sheep treatment as described on GId-16, we have a concern that grazing through April every year may be pushing a little too hard during the early growing season on an every-year basis. Perhaps on alternate years sheep grazing could be terminated by April 1 or so.

We noticed that on some of the allotments utilization levels were specified on livestock forage species and on some species important to wildlife. We question why utilization levels were not specified for all allotments.

It appears that for the six allotments covered in the document, that roughly 36,000± acres have been identified for some type of vegetal manipulation. Would this amount of acreage be in excess of that identified in the Schell EIS? If this is the case, would the management plan be beyond the scope of the EIS and therefore be in conflict with that document? We certainly may have some concerns with vegetal manipulation, but until site specific proposals are made, we cannot provide any comment. We feel we can be assured that site specific EA's will be prepared and if significant wildlife conflicts arise, the project would be altered to adequately mitigate or preclude adverse impacts.

Within the HMP section, we would suggest the inclusion of the following table which addresses consumptive use of pronghorn antelope in the area.

Ms. Linda A. Ryan
March 28, 1985
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TABLE GII-6: Consumptive Use of Pronghorn Antelope in the Antelope Range Coordinated Management Plan Area, Nevada.

DATA BASE	1980	1981	1982	1983	1984
Area Survey Totals-Area 11	431	574	263	491	672
Antelope Valley	153	214	73	173	206
Spring Valley	183	194	93	161	292
Spring Valley (Plan Area)	24(36*)	6(9*)	-(24*)	-(79*)	62(109*)
Harvest Totals (Area 11)**	40	53	48	33	31
Antelope Valley	18	22	17	8	6
Antelope Valley (Plan Area)	17	20	14	8	6
Spring Valley	15	23	23	14	15
Spring Valley (Plan Area)	4	5	3	4	3
Overall % Success - Area 11 (Rifle)	98%	93%	85%	84%	84%
Hunter Days/Antelope (Rifle)	2.1	1.8	2.3	1.8	1.7

* Summer Survey

** Rifle-Archery Combined (Archery Harvest = 1-1981, 4-1982, 1-1983, 4-1984)

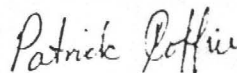
Under the EA section for the Standard Operating Procedures, we do not understand what is meant in number 8. To our knowledge the MOU makes no reference nor does it relate to the Western States Sage Grouse Guidelines. Our recommendation would be to adopt a standard operating procedure to accept the Western States Sage Grouse Guidelines and follow those guidelines whenever vegetal manipulation is conducted in sage grouse habitat. The MOU would still be followed in regards to time of notification on such projects.

Again, we do appreciate the work that went into the plan. Wildlife has been well represented throughout the document and implementation should result in some positive benefits.

If you have any questions on the above or feel a need for further input at this time, please advise.

Sincerely,

WILLIAM A. MOLINI, DIRECTOR



Patrick D. Coffin
Acting Director

RPM:DE:pw

cc: Region II
Game Division